REMARKS

Claims 1-8, 10, 22-27, and 29-30 are rejected under 35 U.S.C. 103(a) as being unpatentable over Ankireddipally (USPAP 2002/0116205) in view of Garber (US Patent No. 5963923). Claim 9 is rejected under 35 U.S.C. 103(a) as being unpatentable over Ankireddipally in view of Garber and further in view of Hauk (USPAP 2003/0126068). Claim 28 is rejected under 35 U.S.C. 103(a) as being unpatentable over Ankireddipally in view of Garber and further in view of Wilton (US Patent No. 6519574).

I.   Claims Rejections

First, Applicant believes that Ankireddipally adds nothing new to Garber, and provides at most a cumulative reference. As discussed in numerous, previous responses and agreed upon by the Office, Garber does not disclose Applicant's claimed invention. It is reasonable to assume that the PMM computers in Garber operate in a similar fashion to the distributed servers disclosed in Ankireddipally. What is still missing, however, from the Ankireddipally/Garber combination, despite the Office's contentions, is specific disclosure of an electronic market taking an action on behalf of a trader by sending an order to buy or sell a different tradeable object to another electronic market, which is called for in Applicant's independent claims.

Applicant respectfully submits that the presently claimed invention, per independent claims 1 and 22, is not merely a predictable use of prior art elements according to their established functions, per the Office's contentions. Indeed, quite the opposite, because the prior art does not disclose the aforementioned elements of the claim, much less their established functions. Using an electronic market to send an order for a different tradeable object to another electronic market on behalf of a trader was not itself recognized previously in the art. Applicant respectfully submits that without hindsight bias of Applicant's specification, this presently claimed aspect was not obvious at the time of invention, but for the creativity and insight of the Applicant.

In addition, the Office's reasons for combining Ankireddipally and Garber on page 3 of the Office Action ("Orders that cannot be matched in one of the markets can be sent to the other as exemplified in the Ankireddipally…, thereby making the system

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more efficient.") actually indicate non-obviousness in this instance, because each electronic market in Applicant's claim matches a *different* tradeable object. As such, the order being sent from the first electronic market to the second electronic market is for a different tradeable object, and would not have been matched by the first electronic market.

The dependent claims 2-11 and 23-30 are patentable for at least the same reasons that that their respective independent base claims are patentable, in addition to their own separate reasons. Applicant traverses the rejections with respect to each dependent claim, and reserves the right to argue their separate reasons for patentability in the future, if the need arises.

II.   Conclusion

All the stated grounds of objection and rejection have been respectfully traversed or accommodated. Applicant therefore submits that the present application is in condition for allowance. If the Examiner believes that further dialog would expedite consideration of the application, the Examiner is invited to contact Trading Technologies in-house Patent Counsel Mark Triplett at 312-476-1151, or the undersigned attorney or agent.

Respectfully submitted,

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